

Tehama-Colusa Canal Authority

September 22, 1999

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Ken LaGrande
Vice Chairman

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Member Agencies:

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Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Ste. 1155
Sacramento, CA 95814

RE: CALFED Bay-Delta Program PEIS/EIR, Draft of June 1999

Dear Mr. Snow,

We appreciate the opportunity to comment on the CALFED Bay-Delta Program PEIS/EIR, Draft of June 1999 (Draft).

The Tehama-Colusa Canal Authority (TCCA) represents all the Central Valley Project (CVP) contractors who receive water from the Tehama-Colusa and Corning canals. In addition to the water service contractors on the two canals in Tehama, Glenn, Colusa and Yolo Counties, the Tehama-Colusa Canal also provides conveyance service to the Glenn-Colusa Irrigation District for several Sacramento Valley national wildlife refuges. TCCA is a joint powers authority that has the full operation and maintenance responsibility for the two canals, and generates all its own operating funds through the conveyance service it provides.

More than a million acre feet of water supply from the Sacramento River/Delta System has been lost to beneficial use by Californians over the past several years. In an effort to rectify and reverse this situation, we have participated in the CALFED process since its framework agreement was signed in 1994. At the start, CALFED had lofty goals and a formal position that all water users should "get better together". We eagerly joined in workgroups and other forums to try to develop programs and solutions to problems that would be beneficial without redirecting adverse impacts onto current water users.

However, the June 1999 Draft PEIS/EIR (Draft) document has proposed to meet the water needs of an additional 15 million Californians in the next 25 years and provide greatly increased water amounts for environmental uses of all types by simply taking water away from current users. This would be accomplished by direct unilateral reallocation of water from existing use and such other methods as water transfers, mandatory water conservation, watershed management, agricultural land fallowing, and conjunctive use.

The 4600 page Draft document is not equitable in its application and holds nothing for Northern California, and in particular, the TCCA service area. The Solution Principles fall dismally short of being accomplished and the redirected impacts land flat in the lap of Northern California. The affordability of the Draft is a mystery as the beneficiaries and funding have not been identified. Major water conflicts will not be resolved until additional (new!) Supplies are developed to meet the current and future water demands of the state, needs which long ago outstripped the available supply.

However, the Draft does shine in one area--the negative redirected impacts are squarely focused on the Sacramento Valley! We feel this so called "long-term comprehensive plan" designed to restore ecological health and improve water management for beneficial uses of the Bay-Delta system will do so at the expense of the ecosystem and economy of the north state.

Attached are our comments on the Draft PEIS/EIR. We find it difficult to support any document that takes huge amounts of water away from current agricultural users in the Sacramento Valley and offers absolutely nothing in return. CALFED should look back to where it was a couple of years ago before it became unbalanced by special interests. **We don't need to start over but it is certainly time to return to the original goals of equity, fairness, and everyone "getting better together"!**

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur R. Bullock", with a stylized flourish at the end.

Arthur R. Bullock
General Manager and Chief Engineer

ARB/jj

Attachment

**COMMENTS OF THE
TEHAMA-COLUSA CANAL AUTHORITY
ON THE
*CALFED Bay-Delta Program PEIS/EIR
June 1999 Draft***

The Tehama-Colusa Canal Authority (TCCA) delivers agriculture and environmental water to 17 water districts and several wildlife refuges in Tehama, Glenn, Colusa and Yolo Counties. Since 1986, the original delivery capabilities of the system has been increasingly restricted from 12 months a year to the current status of 4 months a year due primarily to actions under the Environmental Species Act. The TCCA users have been looking to CALFED to uphold the promises made by several of the Secretary of Interior's predecessors to fulfill the water needs of the Sacramento Valley before water is exported out of the area.

Although the CALFED Bay-Delta Program, June 1999 Draft PEIS/EIR is a lengthy accumulation of various ideas, it lacks clarity and definition in many areas and redirects impacts to the North State without recognizing the essential component of addition surface water supply to meet the demands of a growing population on the already stressed system.

GENERAL COMMENTS

Storage and Conveyance

1. Although the Draft recognizes the need for additional storage and identifies the ecologically benefits of off-stream storage, it lacks an aggressive plan to obtain that storage. We can not support a plan that does not make additional surface storage in the north state a priority. Off-stream surface storage in the Sacramento Valley is ecologically and operationally preferred and must be pursued immediately to answer the growing water demands of a State whose ecosystem is in peril and whose population continues to expand.
2. The concept of "beneficiaries pay" must be clarified. It must be clearly stated and understood just who those beneficiaries are. In implementing a Environmental Water Account, the environment must be recognized as the primary beneficiary.
3. The TCCA supports the extension of the Tehama-Colusa Canal but opposes any reduction to supply available to TCCA current users as a result of such an extension (Page 5.3-35, PEIS/PEIR)
4. The TCCA can not support an isolated facility or through Delta facility and the

additional water such a facility would convey without a provision for immediate new surface water storage north of the Delta.

5. A pilot project at Hood should also not be constructed without new surface storage north of the Delta.

Water Use Efficiency

6. Although we support water conservation, the implementation of aggressive conservation measures will not supply the quantity of water needed to satisfy this state's growth. Conserved water is not new water, but merely redirected water and by itself can not solve California's water problem.
7. The Water Use Efficiency (WUE) program must establish a means to recognize those water conservation measures that have already been implemented and acknowledge those efforts as complying with this program. Water rights should not be altered, giving preference to a "Johnny-come-lately" conservationist over a long time conservationist.
8. Fallowing should not be considered a conservation measure and should acknowledge the degradation it can cause to groundwater supply.
9. The WUE program must recognize and mitigate for third part impacts as a result of conservation (i.e. groundwater degradation, salinity intrusion, destruction of habitat, etc.).

Land Acquisition

10. It appears that the CALFED program has already began portions of Phase III through land acquisitions through the Category III funding program. It has been quoted that a comprehensive existing conditions report on land acquisition in the Sacramento Valley has more that 275,000 acres of land dedicated towards land acquisition programs for habitat related purposes (Northern California Water Association Newsletter, Vol. 8, No. 9, September, 1999) by government entities, private companies and non-profit organizations. A coordination of these and future acquisition must be completed before additional land is taken out of production and infrastructures and communities are put at risk.
11. The tax base of communities and counties must be mitigated. All past Payment In Lieu of Taxes owed by the government must be paid prior to allowing additionally

acquired lands to be taken out of agricultural production.

Area of Origin

12. Area of origin protections must be honored. The north state has been given promises in the past that need to be fulfilled. In 1948, as the Bureau was beginning to organize meetings of farmers in the Sacramento Valley to seal their commitments to buy CVP water, Secretary of the Interior J. A. Krug visited the Valley and stated:

"Let me state, clearly and finally, the Interior Department is fully and completely committed to the policy that no water which is needed in the Sacramento Valley will be sent out of it . . . There is no intent on the part of the Bureau of Reclamation ever to divert from the Sacramento Valley a single acre-foot of water which might be used in the valley now or later."

13. The needs of the Sacramento Valley should not be sacrificed to the highest dollar south of the Delta.

Environmental Water

14. All environmental water should be subject to a conservation program. This program should be held to the same standards as the urban and agricultural water management programs.
15. The TCCA supports a Environmental Water Account (EWA) provided that it not be in addition to current environmental water programs and take additional water from current users. The funding provided through this account should be to purchase water for current and future environmental water programs and should be audited by a panel of agency representatives and water users. The EWA should operate under strict rules and regulations set to prevent abuse.
16. Formal demonstration of efficient use of current environmental water should be a prerequisite before additional water is allocated for environmental purposes.
17. Any re-operations for EWA program purposes must be feasible and scientifically justified.

Ecosystem Restoration

18. The Ecosystem Restoration program will require more water and should be considered a beneficiary of the new water developed by the construction of new offstream storage reservoirs.
19. Watershed programs should be locally operated and controlled.
20. All ecosystem restoration programs should have local participation and should comply with local ordinances.
21. Mitigation for negative economic impacts of ecosystem restoration should be made to local communities.
22. Ecosystem restoration projects must not threaten or impact essential infrastructures.

CONCLUSION

Again, this Draft holds little, if nothing, for the North State. It is vague regarding ecosystem restoration and the coordination of that program. There is a distinct need for clear bench marks to assure stakeholders that restoration will be met; and if not, that at a certain point it will be determined that enough is enough and evolution will be allowed to proceed. The overall program should not trade one ecosystem and economy for another.